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ATTORNEY FOR DEFENDANTS

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

The Mitchell Law Firm, L.P.

Plaintiff

v.

**Bessie Jeanne Worthy Revocable
Trust and Estate of Bessie Jeanne
Worthy**

Defendants

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Civil Action No. 3:16-cv-02582

DEFENDANTS' ORIGINAL ANSWER

COME NOW, Bessie Jeanne Worthy Revocable Trust (the “**Trust**”) and Estate of Bessie Jeanne Worthy (“**Estate**”) (Trust and Estate collectively, the “**Defendants**”), Defendants in the above-entitled and numbered case and file this their Original Answer in this proceeding initiated by The Mitchell Law Firm, L.P. (“**Plaintiff**”), and in support thereof respectfully represent:

I. GENERAL DENIAL

1. Subject to such stipulations and admissions as may be made hereafter, Defendants hereby enter a general denial as is permitted by Rule 8 of the Federal Rules of Civil Procedure, and requests that Plaintiff be required to prove by a preponderance of the evidence the charges and allegations.

II. ADMISSIONS AND DENIALS

2. Defendants admit the allegations in paragraphs 1, 2, and 2A.

3. Defendants deny the allegations in paragraphs 3-12.

WHEREFORE, PREMISES CONSIDERED, Defendants pray this Court enter judgment that Plaintiff takes nothing, assess costs against Plaintiff, and for such other and further relief to which Defendants may be justly entitled, at law or in equity.

SIGNED this 12th day of September, 2016.

Respectfully submitted,

JOYCE LINDAUER

/s/ Joyce Lindauer

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ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing was served via the Court's ECF system or by e-mail and/or U.S. mail on the attorney for the Plaintiff on this 12th day of September, 2016.

/s/ Joyce Lindauer

Joyce Lindauer
Attorney for Defendants